

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

V.

JAMES A. WOLFE

Criminal No. 18-170 (KBJ)
Sentencing Date: December 20, 2018

NOTICE OF SUPPLEMENTAL AUTHORITY

James A. Wolfe, through counsel, respectfully submits supplemental authority in support of Mr. Wolfe's Reply to the Government's Sentencing Memorandum, ECF No. 51 (Wolfe Reply Mem.). *United States v. Davis*, 863 F.3d 894, 910 (D.C. Cir. 2017) relates to the issues addressed in Wolfe Reply Mem. at 9.

Date: December 19, 2018

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that, on December 19, 2018, I caused a copy of the foregoing Notice of Supplemental Authority to be served by electronic means, through the Court's CM/ECF system, upon all counsel of record.

/s/
Lauren R. Randell, Esq.